

E-filed with Docket# 2021-SCAs

September 9, 2021

Lucy Morgans, Acting Program Manager
Safety Policy Division
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Agreement to Implement the Findings (Including Recommendations) of the 2021 Safety Culture Assessment Report

Director Thomas Jacobs,

Pursuant to Public Utilities Code Section 8389(e)(2), SCE can satisfy the "good standing" requirement for safety certification by agreeing "to implement the findings of its most recent safety culture assessment" (SCA), if applicable. Energy Safety's letter of September 2, 2021, enclosing SCE's 2021 Safety Culture Assessment Report (SCA report), states that SCE may do so "by submitting a letter to this effect via E-Filing on the 2021 Safety Culture Assessments docket (Docket #2021-SCAs)."

On November 19, 2020, in Resolution WSD-011, the Commission approved an annual SCA process. SCE's SCA was conducted between March 2021 and August 2021 by DEKRA Services, Inc. (DEKRA), a consultant retained by Energy Safety. Energy Safety published a draft report on August 24, 2021 of its findings and recommendations based on an evaluation of SCE's safety culture assessment. On September 2, 2021, Energy Safety issued the SCA report attaching SCE's comments to the draft report.¹ The recommendations by Energy Safety on SCE's 2021 SCA and SCE's response to these recommendations are described below.

As noted in the SCA report, SCE has been "actively and directly focused on improving its culture for wildfire and personal safety"² and "frontline employees feel empowered to work safely."³ However, the SCA report also noted opportunities for improvement. To

¹ 2021 Safety Culture Assessment Report for SCE, available at:
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51714&shareable=true>

² SCA Report, p. 10.

³ SCA Report, p. 11.

drive consistent improvements in SCE's safety culture, the report makes four recommendations:⁴

1. Update current safety leader activities to address issues noted by the workforce concerning wildfire communications, roles, and decisions.
2. Use Safety Culture Pulse Surveys to evaluate progress of supervisors in engaging frontline workers on wildfire hazards and providing clear communication about wildfire-related procedures.
3. Embed learning organization concepts into the culture via training, incident investigations and corrective action systems.
4. Recognize and take action to mitigate the serious exposure posed by interactions with certain discontented members of the public.

By this letter, SCE agrees to implement all of the findings and recommendations for improvement in the SCA report, thereby meeting the "good standing" requirement of Section 8389(e)(2). If you have any questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

//s//

Michael A. Backstrom

Vice President Regulatory Policy

Southern California Edison

CC:

Caroline Thomas Jacobs, Director, Office of Energy Infrastructure Safety
Ryan Arba, Program & Project Supervisor, Office of Energy Infrastructure Safety
Sara Moore, Wildfire Safety Analyst, Office of Energy Infrastructure Safety
Service List for Docket #2021-SCAs

⁴ SCA Report, pp. 1-2.